

MEMO

July 25, 2005

To: PRD File 
 From: Donna Darm, Assistant Regional Administrator, PRD

cc: Kirsten Erickson, NOAA General Counsel, NW
 Mike Crouse, Assistant Regional Administrator, HCD

Subject: Designating Critical Habitat for West Coast Salmon and Steelhead - Considerations for Department of Defense Lands and Impact on National Security

Background

In a statement of national policy, the President observed that “the threat of terrorism is an inescapable reality of life in the 21st century.” He stated that: “The country is now at war, and securing the homeland is a national priority.” (Bush, 2002, “Securing the Homeland Strengthening the Nation”) On November 24, 2003, the President signed the National Defense Authorization Act (NDAA) for Fiscal Year 2004 (Public Law No. 108-136) which resulted in several changes to the ESA. Key changes to the ESA related to our critical habitat assessment include those described in section 318 of the NDAA with respect to “Military Readiness and Conservation of Protected Species.” Specifically, section 4(b)(2) of the ESA (16 U.S.C. 1533(b)(2)) was recently amended to read: “The Secretary shall designate critical habitat, and make revisions thereto, under subsection (a)(3) of this section on the basis of the best scientific data available and after taking into consideration the economic impact, **the impact on national security**, and any other relevant impact, of specifying any particular area as critical habitat. The Secretary may exclude any area from critical habitat if he determines that the benefits of such exclusion outweigh the benefits of specifying such area as part of the critical habitat, unless he determines, based on the best scientific and commercial data available, that the failure to designate such area as critical habitat will result in the extinction of the species concerned.” [emphasis added]

A separate memorandum from Matt Longenbaugh (HCD), evaluates 11 Department of Defense sites with draft or final Integrated Natural Resource Management Plans (INRMP). Based on the information and analysis contained in the memo, I have determined that each INRMP provides a benefit to the listed salmon or steelhead ESUs under consideration at the site. Therefore, the final rule the Region has prepared for the Assistant Administrator’s signature finds that those areas subject to final INRMPs are not eligible for designation pursuant to section 4(a)(3)(B)(I) of the ESA (16 U.S.C. 1533(A)(3)). At the request of the Department of Defense (and in the case that an INRMP might not provide a benefit to the species), we have also analyzed the impacts on national security that may result from designating these and other military sites as critical habitat.

The Department of Defense has identified the following 24 military sites in Washington State where impacts to national security may result from designating critical habitat: (1) Naval Submarine Base, Bangor; (2) Naval Undersea Warfare Center, Keyport; (3) Naval Ordnance Center, Port Hadlock (Indian Island); (4) Naval Radio Station, Jim Creek; (5) Naval Fuel Depot, Manchester; (6) Naval Air Station Whidbey Island; (7) Naval Air Station, Everett; (8) Bremerton Naval Hospital; (9) Fort Lewis (Army); (10) Pier 23 (Army); (11) Yakima Training Center (Army); (12) Puget Sound Naval Shipyard; (13) Naval Submarine Base Bangor security zone; (14) Strait of Juan de Fuca naval air-to-surface weapon range, restricted area; (15) Hood Canal and Dabob Bay naval non-explosive torpedo testing

area; (16) Strait of Juan de Fuca and Whidbey Island naval restricted areas; (17) Admiralty Inlet naval restricted area; (18) Port Gardner Naval Base restricted area; (19) Hood Canal naval restricted areas; (20) Port Orchard Passage naval restricted area; (21) Sinclair Inlet naval restricted areas; (22) Carr Inlet naval restricted areas; (23) Dabob Bay/Whitney Point naval restricted area; and (24) Port Townsend/Indian Island/Walan Point naval restricted area. These sites overlap with habitat areas occupied by three of the 13 ESUs affected by the present critical habitat designation: Puget Sound Chinook salmon, Hood Canal summer-run chum salmon, and upper Columbia River steelhead (Table 1). We examined a number of other sites identified by the military agencies (primarily armories and small Army facilities) and determined they are outside the areas under consideration.

Table 1: Military Sites within the Range of ESUs under Consideration for Critical Habitat Designation

ESU	Army or Navy INRMP Site	Navy Security Zone or Restricted Area
Puget Sound Chinook salmon	<ul style="list-style-type: none"> • Naval Submarine Base, Bangor • Naval Undersea Warfare Center, Keyport • Naval Ordnance Center, Port Hadlock (Indian Island) • Naval Radio Station, Jim Creek • Naval Fuel Depot, Manchester • Naval Air Station Whidbey Island • Naval Air Station, Everett • Bremerton Naval Hospital • Fort Lewis (Army) • Pier 23 (Army) • Puget Sound Naval Shipyard 	<ul style="list-style-type: none"> • Naval Submarine Base Bangor security zone • Strait of Juan de Fuca naval air-to-surface weapon range, restricted area • Hood Canal and Dabob Bay naval non-explosive torpedo testing area • Strait of Juan de Fuca and Whidbey Island naval restricted areas • Admiralty Inlet naval restricted area • Port Gardner Naval Base restricted area • Hood Canal naval restricted areas • Port Orchard Passage naval restricted area • Sinclair Inlet naval restricted areas • Carr Inlet naval restricted areas • Dabob Bay/Whitney Point naval restricted area • Port Townsend/Indian Island/Walan Point naval restricted area
Hood Canal summer-run chum salmon	<ul style="list-style-type: none"> • Naval Submarine Base, Bangor • Naval Ordnance Center, Port Hadlock (Indian Island) 	<ul style="list-style-type: none"> • Naval Submarine Base Bangor security zone • Hood Canal and Dabob Bay naval non-explosive torpedo testing area • Admiralty Inlet naval restricted area • Hood Canal naval restricted areas • Dabob Bay/Whitney Point naval restricted area • Port Townsend/Indian Island/Walan Point naval restricted area
Upper Columbia River steelhead	<ul style="list-style-type: none"> • Yakima Training Center (Army) 	na

At our request, both the Army and Navy provided information clarifying site locations and describing the types of military activities that occur at these sites (see attachments). They also listed the potential changes in these activities and consequent national security impacts that critical habitat designation would cause in these areas. Both military agencies concluded that critical habitat designation at any of these sites would likely impact national security by diminishing military readiness. The possible impacts include: preventing, restricting, or delaying training or testing exercises or access to such sites; restricting or delaying activities associated with vehicle/vessel/facility maintenance and ordinance loading; delaying response times for ship deployments and overall operations; and creating uncertainties

regarding ESA consultation (e.g., reinitiation requirements) or imposing compliance conditions that would divert military resources. Also, both military agencies cited their ongoing and positive consultation history with NMFS and underscored cases where they are implementing best management practices to reduce impacts on listed salmonids.

Balancing designation against the impact on national security

The principal benefit of designating critical habitat is section 7's protection against adverse modification through federal agency action. All activities occurring on Defense Department land will require action, funding or permission by the Defense Department and thus be subject to a section 7 consultation if they affect listed salmon and steelhead. In addition, all Navy activities in Navy security zones will require section 7 consultation if they affect listed salmon and steelhead. This creates a strong connection between military lands and security zones and the protections of section 7.

As described above, there were 24 sites with national security impacts. The sites include 11 land-based facilities (all of which are subject to INRMPs) and 12 Navy security zones in Puget Sound. Tables 1-3 show the amount of habitat involved for Puget Sound Chinook salmon, Hood Canal summer-run chum salmon, and Upper Columbia River steelhead, respectively.

Puget Sound Chinook Salmon ESU - The benefit of designating areas occupied by this ESU on military sites is that the Army and Navy would be required to ensure their activities are not likely to destroy or adversely modify the physical and biological features of the area that are essential to conservation of Puget Sound Chinook salmon. (Most of the activities in the affected areas would be activities initiated by the Army or Navy, since all of the stream miles and nearshore miles are adjacent to a military site) We found all of the areas have a high value for conservation of this ESU. The nearshore areas represent the larger proportion of areas affected (2 percent, versus 1 percent for stream areas). The loss and degradation of nearshore and estuarine areas in Puget Sound is considered to be one of the factors limiting the recovery of the Chinook ESU because the habitat loss has been so severe (e.g., King County Department of Natural Resources, 2001) and because the transition from fresh to salt water can be a period of high mortality (Percy, 1992). The high conservation value of these areas, the importance of these areas in the Puget Sound Chinook life cycle, and the historic loss of intact nearshore and estuary habitat, make these areas particularly significant for conservation of this ESU. The benefit of designation is reduced somewhat by the fact that all of the stream miles affected by national security impacts are covered by INRMPs, as discussed previously. The benefit of designation of all nearshore areas is also reduced when put in perspective of the total nearshore habitat available to this ESU. The nearshore areas excluded represent a relatively small percent of all available nearshore habitat. Table 1 shows the areas involved.

Table 1. Puget Sound Chinook – summary of critical habitat areas with impacts on national security

Conservation Rating	Number of stream or shoreline miles in military sites / Total number of stream or shoreline miles occupied by ESU	Military Site Overlap as % of Total Occupied
High (stream)	19 / 1,747	1%

High (shoreline)	48 ^a / 2,376	2%
Medium	0 / 255	
Low	0 / 214	

The benefit of excluding these areas is that the Army and Navy would not need to reinitiate consultation on ongoing activities for which consultation has been completed. Reinitiation of consultation would likely require some commitment of resources on their part. Moreover, the Army and Navy may be required to modify some activities to ensure they would not be likely to adversely modify the critical habitat. The Army and Navy maintain that this additional commitment of resources, would likely reduce their readiness capability. Given that the Army and Navy are currently actively engaged in training, maintaining, and deploying forces in the current war on terrorism, this reduction in readiness could reduce the ability of the military to ensure national security.

Given the following considerations, we support a finding that the benefits of exclusion outweigh the benefits of designation:

- the high priority placed on national security by Congress and the Administration;
- the potential for critical habitat designation to have some impact on military readiness;
- the fact that most of these areas are covered by INRMPs that we find provide a benefit for the ESU, as implemented; and
- the fact that collectively these areas represent one percent of the stream miles and two percent of the nearshore miles available for this ESU.

Hood Canal Summer-run Chum Salmon ESU - The benefit of designating areas occupied by this ESU on military sites is that the Navy would be required to ensure their activities are not likely to destroy or adversely modify the physical and biological features of the area that are essential to conservation of Hood Canal summer-run chum. (Most of the activities in the affected areas would be activities initiated by the Navy, since all of the nearshore miles are adjacent to a military site.) We found all of the areas have a high value for conservation of this ESU. The nearshore areas are the only areas affected (no stream miles are within military areas). The loss and degradation of nearshore and estuarine areas in Puget Sound is considered to be one of the factors limiting the recovery of the chum ESU because the habitat loss has been so severe and because the transition from fresh to salt water may be a period of high mortality (Pearcy, 1992; Washington Department of Fish and Wildlife and Point No Point Treaty Council, 2000). The high conservation value of these areas, the importance of these areas in the chum life cycle, and the historic loss of intact nearshore and estuary habitat, make these areas particularly significant for conservation of this ESU. The benefit of designation is reduced somewhat by the fact that all of the nearshore stream miles affected by national security impacts are covered by INRMPs, as discussed previously. The benefit of designation of all Navy areas is also reduced somewhat when put in perspective of the total nearshore habitat available to this ESU – four percent of the total nearshore habitat available. This is not an insignificant amount. However, there is only a small additional

a Approximately 109 miles of occupied shoreline overlap with Navy sites in the range of this ESU. However, after consulting with the Navy, we are designating critical habitat in a narrow nearshore zone (from extreme high tide down to mean lower low water (MLLW)) within Navy security zone areas that are not subject to an approved INRMP or associated with Department of Defense easements or right-of-ways. This narrow zone is expected to contain all of the activities likely to trigger a section 7 consultation but its designation is not likely to have significant impacts on national security. The “deeper” nearshore zone (i.e., from MLLW out to a depth of 30 meters) associated with these sites is being excluded from designation due to impacts on national security and is not included in the 19 miles cited in Table 1a.

exclusion being considered for nearshore areas for this ESU – another 2 percent for Indian lands. The total being considered for exclusion, then, is only 6 percent.

Table 2. Hood Canal summer-run chum - summary of critical habitat areas with impacts on national security

Conservation Rating	Number of stream or shoreline miles in military sites / Total number of stream and shoreline miles occupied by ESU	Military Site Overlap as % of Total Occupied
High (stream)	0 / 60	
High (shoreline)	16 ^b / 402	4%
Medium	0 / 28	
Low	0 / 214	

The benefit of excluding these areas is that the Navy would not need to reinitiate consultation on ongoing activities for which consultation has been completed. Reinitiation of consultation would likely require some commitment of resources on the part of the Navy. Moreover, the Navy may be required to modify some of its activities to ensure they would not be likely to adversely modify the critical habitat. The Navy maintains that this additional commitment of resources, would likely reduce its readiness capability. Given that the Navy is currently actively engaged in training, maintaining, and deploying forces in the current war on terrorism, this reduction in readiness could reduce the ability of the military to ensure national security.

Given the following considerations, we support a finding that the benefits of exclusion outweigh the benefits of designation:

- the high priority placed on national security by Congress and the Administration;
- the potential for critical habitat designation to have some impact on the Navy’s military readiness;
- the fact that these areas are covered by INRMPs that we find provide a benefit for the ESU, as implemented; and
- the fact that collectively these areas represent four percent of the nearshore miles available for this ESU.

Upper Columbia River Steelhead ESU - The benefit of designating areas occupied by this ESU on military sites is that the Army would be required to ensure its activities are not likely to destroy or adversely modify the physical and biological features of the area that are essential to conservation of Upper Columbia River steelhead. (Most of the activities in the affected areas would be activities initiated by the Army, since all of the stream miles are on a military site.) We found all of the areas have a high value for conservation of this ESU. The benefit of designation is reduced somewhat

b Approximately 41 miles of occupied shoreline overlap with Navy sites in the range of this ESU. However, after consulting with the Navy, we are designating critical habitat in a narrow nearshore zone (from extreme high tide down to mean lower low water (MLLW)) within Navy security zone areas that are not subject to an approved INRMP or associated with Department of Defense easements or right-of-ways. This narrow zone is expected to contain all of the activities likely to trigger a section 7 consultation but its designation is not likely to have significant impacts on national security. The “deeper” nearshore zone (i.e, from MLLW out to a depth of 30 meters) associated with these sites is being excluded from designation due to impacts on national security and is not included in the 16 miles cited in Table 2a.

by the fact that all of the stream miles affected by national security impacts are covered by INRMPs, as discussed previously. The benefit of designation of all Army areas is also reduced when put in perspective of the total habitat available to this ESU.

Table 3. Upper Columbia River steelhead - summary of critical habitat areas with impacts on national security

Conservation Rating	Number of stream or shoreline miles in military sites / Total number of stream and shoreline miles occupied by ESU	Military Site Overlap as % of Total Occupied
High (stream)	10 / 1,199	1%
Medium	0 / 121	
Low	0 / 12	

The benefit of excluding these areas is that the Army would not need to reinitiate consultation on ongoing activities for which consultation has been completed. Reinitiation of consultation would likely require some commitment of resources on the part of the Army. Moreover, the Army may be required to modify some of its activities to ensure they would not be likely to adversely modify the critical habitat. The Army maintains that this additional commitment of resources, would likely reduce its readiness capability. Given that the Army is currently actively engaged in training, maintaining, and deploying forces in the current war on terrorism, this reduction in readiness could reduce the ability of the military to ensure national security.

Given the following considerations, we support a finding that the benefits of exclusion outweigh the benefits of designation:

- the high priority placed on national security by Congress and the Administration;
- the potential for critical habitat designation to have some impact on the Army's military readiness;
- the fact that these areas are covered by an INRMP that we find provides a benefit for the ESU, as implemented; and
- the fact that collectively these areas represent one percent of the stream miles available for this ESU.

Conclusion

I recommend that all of the military areas identified by the Department of Defense be excluded from critical habitat designation based on the conclusion that the benefits of exclusion outweigh the benefits of designation.

Attachments:

- (1) Letter from R. Campagna (U.S. Navy) to D. Darm (NOAA Fisheries) dated October 22, 2004
- (2) Letter from C. Schuster (U.S. Army) to D. Darm (NOAA Fisheries) dated October 25, 2004
- (3) Map depicting DOD site overlap with areas under consideration for critical habitat.

**DEPARTMENT OF THE NAVY**

NAVY REGION NORTHWEST
1103 HUNLEY RD.
SILVERDALE, WASHINGTON 98315-1103

5090
Ser N45/ 3130
22 Oct 04

Ms. Donna Darm
Assistant Regional Administrator
Protected Resources Division
NOAA Fisheries, Northwest Region
525 NE Oregon Street
Portland, OR 97232-2737

Dear Ms. Darm,

We appreciate the opportunity to provide additional information pertaining to impacts on national security resulting from designating Salmon critical habitat in areas owned, controlled or used by the Navy in Washington, Oregon, and Idaho. We have reviewed your summary of impacts, list of all section 7 consultations that NOAA Fisheries has had to date with the Navy and the maps as provided in your letter of 22 September 2004.

Additional information on Navy impacts has been provided in enclosure 1, Summary of Impacts including comments on the list of section 7 consultations. Comments on the maps are as follows:

USN 6 Jim Creek: Property boundary on the east side should follow "Navy Installation Boundary" line.

USN 5 Naval Air Station Whidbey Island: Two areas on the map are covered by the Naval Air Station Whidbey Island INRMP and should be identified in red as DoD Site Boundary for overlap with the INRMP. The areas are as follows:

1. All of the proposed critical habitat within the Seaplane Base on the west side of Maylor Point internal in the tidal salt marsh.
2. The proposed critical habitat internal in the tidal lagoon area of Lake Hancock.

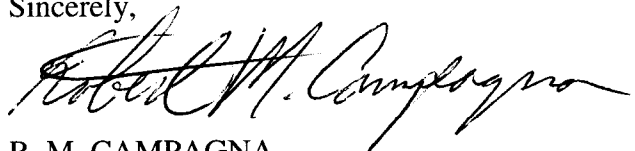
As shown in enclosure 1, the Navy routinely consults with NOAA Fisheries on military-related actions that may affect endangered species at the Navy sites listed in enclosure 1 and within the marine environment. From our review of your maps it appears that the near shore marine zone is the principal overlap area between your proposed critical habitat and where routine Navy activity occur for all but one site, {Naval Station Jim Creek}. These near shore zones are vital security areas that provide the Navy with necessary training, testing, maintenance, moorage and security sites that are critical to sustaining combat-ready naval forces to defend our nation. Navy believes that critical habitat designation in any of these near shore zones could negatively impact national security in at least two ways as follows:

First, we are concerned that critical habitat designation may compel NOAA-F to reinitiate ESA section 7 consultation on activities previously consulted on to determine if the newly designated critical habitat would be degraded or adversely modified. Reinitiation of the consultation process would result in significant delays and stoppages to essential military readiness activities.

Second, there is considerable uncertainty about the types of conditions that NOAA Fisheries may impose if a Navy action would likely adversely modify critical habitat. As described briefly in our enclosure, the Navy conducts a variety of activities in all of the near shore areas identified that have the potential to affect salmonid habitat. Examples include: wave/shoreline impacts from transiting vessels; substrate and water quality impacts from pier and dry dock maintenance; dry dock operations, storm water controls and even habitat preservation. The Navy currently consults under the Magnusson Stevens Act and the ESA to modify these activities to reduce impact to the species and associated essential habitat. Additional burdens placed on these activities as a result of critical habitat designation not only could impose greater restrictions to the Navy, but also does not provide any additional benefit to the species.

We appreciate the NOAA Fisheries support and continued cooperation on these issues within the Northwest Region. If you have questions on the above, please contact Hayden Street, Navy Region North West at (360) 396-5089.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert M. Campagna", written over a horizontal line.

R. M. CAMPAGNA

By direction

Enclosure (1) Summary of Impacts

Copy to:

CNI (N45)

CFFC (N7)

CPF (N01CE)

COMNAVREG NW

Enclosure 1: Summary of Impacts

Site Descriptions

Navy Sites

The sites described below are believed to overlap with habitat areas under consideration for designation as critical habitat for Pacific salmon and steelhead. The accompanying table identifies ESA consultations at or in the vicinity of these sites as reported in NOAA Fisheries' Public Consultation Tracking System.

Site USN1: NAVMAG Indian Island

- Affected ESU(s): Puget Sound chinook and Hood Canal summer-run chum salmon
- INRMP: Yes
- DOD Description of Facilities & Activities: NAVMAG Indian Island provides a mission critical service for receipt, storage, issuance, and inspection of Naval ordnance. NAVMAG Indian Island is required to retain full access and the ability to manage and maintain the ammunition pier, nearby marine areas, and established fair weather and foul weather anchorages.
DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: NAVMAG Indian Island routinely consults with NOAA Fisheries on maintenance and repair of existing waterfront facilities and new construction. INRMP may be modified to include additional salmon enhancement requirements.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: In general the Navy believes that critical habitat designation would pose an unacceptable detriment to its installations' capability to adequately support military training and operations. Any degradation of this site's capacity or capability to fulfill ordnance support requirements of Fleet assets represents a significant impact on the installation's military readiness function.
- Correspondence Reference(s): March 26, 2004 letter from Clare Mendelsohn (DOD Regional Environmental Coordinator) to Donna Darm (NOAA Fisheries); April 16, 2004 letter from Robert M. Campagna (Navy) to Donna Darm (NOAA Fisheries); July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN2: Naval Undersea Warfare Center, Division Keyport and Associated Ranges in Puget Sound [Including Sites USN10, USN12, and USN20]

- Affected ESU(s): Puget Sound chinook and Hood Canal summer-run chum salmon
- INRMP: Yes. Open water marine areas may need to be added
- DOD Description of Facilities & Activities: NUWC Keyport provides state-of-the-art infrastructure and capabilities in the Pacific Northwest that have been essential to the Navy's comprehensive underwater test and evaluation programs for undersea weapons, Unmanned Undersea Vehicles (UUVs), and related combat systems. NUWC Keyport's access to the adjacent waterfront and to underwater test ranges is mission-critical for NUWC's role in providing integrated Undersea Warfare Systems Dependability. The in-water environments in the Puget Sound area and surrounds are essential for Keyport's evaluation of systems in both surrogate and real war-fighting environments. The NUWC Shipboard Electronic Systems Evaluation Facilities (SESEFs) are land-based test sites that provide test and evaluation services to U.S. Navy, U.S. Coast Guard and Military Sealift Command activities as well as allied foreign navies. SESEF Ediz Hook is located at Latitude 48 degrees 8 minutes 24 seconds north and Longitude 123 degrees 24

minutes 12 seconds west. The Buoy is located at latitude 48 degrees 14 minutes 15 seconds north and longitude 123 degrees 21 minutes 45 seconds west.

- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: INRMP may be modified to include additional salmon enhancement requirements. Range Extension EIS in progress.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: In general the Navy believes that critical habitat designation would pose an unacceptable detriment to its installations' capability to adequately support military training and testing operations. NUWC testing activities to support military readiness requires precision underwater tracking capabilities and underwater range sites that offer diverse environments and varied water depths from the surface to over 1000 feet and from the shoreline to open ocean. The established in-water test sites adjacent to Keyport and the Dabob Bay Range Complex consisting of the Dabob Bay Range Site and its adjoining waters in Hood Canal are critical to these functions, and limitations on access to, use of, or enhancement of the capabilities and capacities of these ranges would curtail both testing and mission critical Fleet support functions performed by NUWC Keyport. Also continuous access and capacity to maintain the near shore area to support the SESEF capability is essential to the readiness function of this facility.
- Correspondence Reference(s): March 26, 2004 letter from Clare Mendelsohn (DOD Regional Environmental Coordinator) to Donna Darm (NOAA Fisheries); April 16, 2004 letter from Robert M. Campagna (Navy) to Donna Darm (NOAA Fisheries); July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN3: Naval Submarine Base Bangor (now part of Naval Base, Kitsap (NBK))

- Affected ESU(s): Puget Sound chinook and Hood Canal summer-run chum salmon
- INRMP: Yes
- DOD Description of Facilities & Activities: SUBASE, Bangor is located on the east shore of Hood Canal. The pier facilities of the base are located along 4.5 linear miles of waterfront. The primary mission is to provide logistics and support to SSBN (TRIDENT) submarines. The main berthing facilities at SUBASE Bangor consist of four separate pier complexes.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: NBK Bangor routinely consults with NOAA Fisheries on maintenance and repair of existing waterfront facilities and new construction. INRMP may be modified to include additional salmon enhancement requirements.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: In general the Navy believes that critical habitat designation would pose an unacceptable detriment to its installations' capability to adequately support military training and operations. Access to, management of, and maintenance of Base piers, the associated near shore environment, and the consistent provision of all requisite waterfront instrumentation and support for home-ported vessels are critical to military readiness mission.
- Correspondence Reference(s): March 26, 2004 letter from Clare Mendelsohn (DOD Regional Environmental Coordinator) to Donna Darm (NOAA Fisheries); April 16, 2004 letter from Robert M. Campagna (Navy) to Donna Darm (NOAA Fisheries); July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN4: Manchester Fuel Depot

- Affected ESU(s): Puget Sound chinook salmon

- INRMP: Yes
- DOD Description of Facilities & Activities: Located on the shores of Orchard Point, south of Rich Passage, Manchester Fuel Depot's primary mission is to provide bulk fuel and lubricants to area Navy afloat and shore activities. Fuel is also provided to Coast Guard ships, air stations, other Puget Sound Area U.S. military activities, and, on occasion, foreign navy ships.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: Manchester Fuel Depot routinely consults with NOAA Fisheries on maintenance and repair of existing waterfront facilities and new construction. INRMP may be modified to include additional salmon enhancement requirements.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: Navy believes that critical habitat designation would generally pose an unacceptable detriment to its installations' capability to adequately support military training and operations. Access to, management of, and maintenance of Base piers, the associated near shore environment, and the consistent provision of all requisite waterfront instrumentation and support for fueling Navy vessels are critical to military readiness mission.
- Correspondence Reference(s): March 26, 2004 letter from Clare Mendelsohn (DOD Regional Environmental Coordinator) to Donna Darm (NOAA Fisheries); April 16, 2004 letter from Robert M. Campagna (Navy) to Donna Darm (NOAA Fisheries); July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN5: Naval Air Station Whidbey Island

- Affected ESU(s): Puget Sound chinook salmon
- INRMP: Yes
- DOD Description of Facilities & Activities: The primary mission of NAS Whidbey Island is to provide the highest quality facilities, services and products to the naval aviation community and all organizations utilizing the sites at AULT Field, Seaplane Base and Outlying Field, Coupeville, all located on Whidbey Island. Tenant commands at NAS Whidbey Island, such as Explosive Ordnance Disposal Mobile Unit ELEVEN (EODMU 11), rely on accessible near shore and offshore environments to fulfill mission-essential training requirements. EODMU 11 provides combat support for the location, identification, rendering safe, recovery, field evaluation and disposal of all explosive ordnance in littoral and open ocean regions, including security and mine protection. The command's EOD Detachments support the five West Coast Carrier Battle Groups. EOD personnel are required to be fully qualified in diving techniques and require training in all aspects of EOD, as well as in performance of hull inspections, minor underwater repairs, and underwater photography services.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: NAS Whidbey Island routinely consults with NOAA Fisheries on maintenance and repair of existing waterfront facilities and new construction. INRMP may be modified to include additional salmon enhancement requirements.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: In general the Navy believes that critical habitat designation would pose an unacceptable detriment to its installations' capability to adequately support military training and operations. EOD Units commonly operate in areas less than 30 meters in depth and thus any critical habitat would adversely impact EOD's ability to train. Also, additional consultation may create delays having similar impacts on EOD units.

- Correspondence Reference(s): March 26, 2004 letter from Clare Mendelsohn (DOD Regional Environmental Coordinator) to Donna Darm (NOAA Fisheries); April 16, 2004 letter from Robert M. Campagna (Navy) to Donna Darm (NOAA Fisheries); July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN6: Naval Station Jim Creek

- Affected ESU(s): Puget Sound chinook salmon
- INRMP: Yes
- DOD Description of Facilities & Activities: The facility is located along a headwater stream with limited salmon habitat overlap. The Station's primary mission is to operate a very low frequency radio transmitting facility that relays communications from Naval Command to elements of the Pacific Fleet. In addition to the day-to-day operation of the transmitter, the majority of the work at the station involves maintenance (e.g., vegetation control) of the large antenna field located across the valley floor.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: Naval Station Jim Creek routinely consults with NOAA Fisheries on maintenance and repair of existing facilities and new construction. INRMP may be modified to include additional salmon enhancement requirements.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: Navy believes that critical habitat designation would generally pose an unacceptable detriment to its installations' capability to adequately support military training and operations. Access to, management of, and maintenance and operation of transmitter and antenna field to forward Navy communications to the Pacific Fleet are critical to military readiness mission.
- Correspondence Reference(s): March 26, 2004 letter from Clare Mendelsohn (DOD Regional Environmental Coordinator) to Donna Darm (NOAA Fisheries); April 16, 2004 letter from Robert M. Campagna (Navy) to Donna Darm (NOAA Fisheries); July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN7: Naval Station Everett

- Affected ESU(s): Puget Sound chinook salmon
- INRMP: Draft
- DOD Description of Facilities & Activities: As with all Naval Stations, the mission of the facility is centered on a fully functional waterfront that meets all vessel support requirements and allows for efficient deployment of Naval assets for essential training missions and deployment. NAVSTA Everett is home to one destroyer, three frigates and one nuclear-powered aircraft carrier.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: NAVSTA Everett routinely consults with NOAA Fisheries on maintenance and repair of existing waterfront facilities and new construction. Draft INRMP may be modified to include additional salmon enhancement requirements.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: Navy believes that critical habitat designation would generally pose an unacceptable detriment to its installations' capability to adequately support military training and operations. Access to, management of, and maintenance of Base piers, the

associated near shore environment, and the consistent provision of all requisite waterfront instrumentation and support for home-ported vessels are critical to military readiness mission.

- Correspondence Reference(s): March 26, 2004 letter from Clare Mendelsohn (DOD Regional Environmental Coordinator) to Donna Darm (NOAA Fisheries); April 16, 2004 letter from Robert M. Campagna (Navy) to Donna Darm (NOAA Fisheries); July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN8: Naval Station Bremerton (now part of Naval Base, Kitsap)

- Affected ESU(s): Puget Sound chinook salmon
- INRMP: Not required
- DOD Description of Facilities & Activities: The mission of the facility is centered on a fully functional waterfront that meets all vessel support requirements and allows for efficient deployment of Naval assets for essential training missions and deployment. NAVSTA Bremerton is home to three Fast Logistics Ships (AOEs) and one nuclear-powered aircraft carrier. Near shore infrastructure, pierside, and channel approach management and maintenance are mission-critical functions.
- DOD Description of Anticipated Future Consultations: NAVSTA Bremerton routinely consults with NOAA Fisheries on maintenance and repair of existing waterfront facilities and new construction.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: Navy believes that critical habitat designation would generally pose an unacceptable detriment to its installations' capability to adequately support military training and operations. Access to, management of, and maintenance of Base piers, the associated near shore environment, and the consistent provision of all requisite waterfront instrumentation and support for home-ported vessels are critical to military readiness mission.
- Correspondence Reference(s): April 16, 2004 letter from Robert M. Campagna (Navy) to Donna Darm (NOAA Fisheries); July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN9: Puget Sound Naval Shipyard

- Affected ESU(s): Puget Sound chinook salmon
- INRMP: Not required.
- DOD Description of Facilities & Activities: PSNS & IMF Bremerton is an industrial repair and maintenance facility performing conversions, modernizations, maintenance and overhauls on surface ships and submarines. The mission of PSNS & IMF Bremerton is to support Fleet readiness. Restrictions on operations that result in delaying ship arrivals or departures would have a significant impact on national security. PSNS & IMF Bremerton is comprised of property bordered on the south by Sinclair Inlet, on the west by Naval Base Kitsap Bremerton site, and on the north and east perimeters by the City of Bremerton. PSNS & IMF Bremerton is the Pacific Northwest's largest Naval shore facility and one of Washington State's largest industrial installations. It is a heavily industrialized facility consisting of 179 acres of hard land, approximately 200 acres of submerged tidelands, approximately 2300 feet of riprap shoreline, 130 buildings, 6 dry-docks, and 7 piers.
- DOD Description of Anticipated Future •PSNS & IMF routinely consults with NOAA Fisheries on maintenance and repair of existing waterfront facilities and new construction. Future consultations will include:

- Routine repair and maintenance of piers and dry docks (recurring)
- Replacement of Pier B (2007)
- Reinitiation of consultation for dry dock operations (2008)
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: The mission of the Navy is to maintain, train and equip combat-ready Naval forces capable of winning wars, deterring aggression and maintaining freedom of the seas. With the drawdown from a 600 to a 300 ship Navy and the war on terrorism, Naval forces must be both forward deployed and capable of quickly responding anywhere and anytime they are needed. To ensure the Fleet is capable of responding in this manner, the Navy redesigned fleet maintenance strategy to ensure that the proper number and type of ships are always ready to support national defense. Ships undergoing maintenance must complete their maintenance periods and return to service on time to ensure overall fleet readiness. The PSNS & IMF mission is to perform ship maintenance and repairs and return those ships to the Fleet within restricted timeframes. Once maintenance work on a ship begins, unknown problems are frequently found requiring additional repairs. Additional time, however, cannot be allotted without impacting the mission of the Navy. Similarly, there are times when the ship needs to be returned earlier than scheduled to avoid impacting national security. These conditions require that PSNS & IMF become more creative in performing maintenance and repair work in order to avoid impacting national security. Changes have to be made quickly. As a result, there will be times when we would not have the time to engage in consultation with NMFS over potential impacts to critical habitat. Any restrictions impacting the arrival, departure, or length of maintenance periods significantly impacts Fleet schedules and, therefore, the Navy's ability to deploy ships to defend our nation and its allies. A critical habitat designation would result in these types of restrictions and impact ship's maintenance schedules.
- Correspondence Reference(s): April 16, 2004 letter from Robert M. Campagna (Navy) to Donna Darm (NOAA Fisheries); July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN10: Naval Submarine Base, Bangor security zone

- Affected ESU(s): Puget Sound chinook and Hood Canal summer-run chum salmon
- INRMP: Possible partial overlap with NBK Bangor INRMP area
- DOD Description of Facilities & Activities: This open water marine area is a support and security zone for Naval Submarine Base Bangor.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: Specific issues are related to any changes affecting Naval Base Kitsap - Bangor.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: This security zone is an extension of Naval Submarine base Bangor and thus, the mission impacts are identical to those described above for Site USN3: Naval Submarine Base Bangor (now part of Naval Base, Kitsap).
- Correspondence Reference(s): July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN11: Strait of Juan de Fuca, Wash; air-to-surface weapon range, restricted area

- Affected ESU(s): Puget Sound chinook and Hood Canal summer-run chum salmon

- INRMP: Not required
- DOD Description of Facilities & Activities: Home ported ships and ships worked upon at PSNS use this open water marine area to test shipboard equipment prior to departing Puget Sound.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: Specific issues are all related to the operation and testing of ships and equipment.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: Navy believes that critical habitat designation would generally pose an unacceptable detriment to the ships from Puget Sound Installations. Navy ships use this range' (including associated security/restricted zones) to support military training and testing operations critical to these ships performing there defense missions all over the world.
- Correspondence Reference(s): July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN12: Hood Canal and Dabob Bay, Wash; naval non explosive torpedo testing area

- Affected ESU(s): Puget Sound chinook and Hood Canal summer-run chum salmon (note: overlap with near shore zones <30 meters is very limited)
- INRMP: Not required.
- DOD Description of Facilities & Activities: This is a non-explosive torpedo open water marine area range. Also known as the Dabob Bay Range Complex consisting of range sites in Dabob Bay, Hood Canal Military Operating Areas, and the connecting waters.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: Specific issues are related to any changes affecting Naval Undersea Warfare Center, Division Keyport.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: This range is one of the Associated Ranges in Puget Sound for Naval Undersea Warfare Center, Division Keyport and thus, the mission impacts are identical to those described above for Site USN2: Naval Undersea Warfare Center, Division Keyport and Associated Ranges
- Correspondence Reference(s): July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN13: Strait of Juan de Fuca, eastern end; off the westerly shore of Whidbey; Island naval restricted areas

- Affected ESU(s): Puget Sound chinook
- INRMP: Possible partial overlap with Naval Air Station Whidbey Island INRMP area.
- DOD Description of Facilities & Activities: This is an open water marine area support area for operations at Naval Air Station Whidbey Island.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: Specific issues are all related to any changes affecting Naval Air Station Whidbey Island.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: This security zone is an extension of Naval Air Station Whidbey Island and thus, the mission impacts are identical to those described above for Site USN5: Naval Air Station Whidbey Island.

- Correspondence Reference(s): July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN14: Admiralty Inlet, entrance; naval restricted area

- Affected ESU(s): Puget Sound chinook
- INRMP: Not required
- DOD Description of Facilities & Activities: This is an open water marine area for support of operations at Naval Air Station Whidbey Island.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: Specific issues are all related to any changes affecting Naval Air Station Whidbey Island.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: This security zone is an extension of Naval Air Station Whidbey Island and thus, the mission impacts are identical to those described above for Site USN5: Naval Air Station Whidbey Island.
- Correspondence Reference(s): July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN15: Port Gardner, Everett Naval Base, Naval Restricted Area, Everett, Washington

- Affected ESU(s): Puget Sound chinook
- INRMP: Possible partial overlap with Naval Station Everett INRMP area.
- DOD Description of Facilities & Activities: This is an open water marine area for support of ship and pier operations at Naval Station Everett.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: Specific issues are all related to any changes affecting Naval Station Everett.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: This security zone is an extension of Naval Base Everett and thus, the mission impacts are identical to those described above for Site USN7: Naval Station Everett.
- Correspondence Reference(s): July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN16: Hood Canal, Bangor, naval restricted areas

- Affected ESU(s): Puget Sound chinook and Hood Canal summer-run chum salmon
- INRMP: Possible partial overlap with NBK Bangor INRMP area.
- DOD Description of Facilities & Activities: This is an open water marine areas and the security zone for magnetic silencing operations at Naval Submarine Base Bangor.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: Specific issues are all related to any changes affecting Naval Base Kitsap.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: This security zone is an extension of Naval Submarine base Bangor and thus, the mission impacts are identical to those described above for Site USN3: Naval Submarine Base Bangor (now part of Naval Base, Kitsap).

- Correspondence Reference(s): July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN17: Port Orchard Passage; naval restricted area

- Affected ESU(s): Puget Sound chinook
- INRMP: Possible partial overlap with Naval Undersea Warfare Center, Division Keyport INRMP area.
- DOD Description of Facilities & Activities: This is an open water marine area non-explosive torpedo range.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: Specific issues are all related to any changes affecting Naval Undersea Warfare Center, Division Keyport.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: This range is one of the Associated Ranges in Puget Sound for Naval Undersea Warfare Center, Division Keyport and thus, the mission impacts are identical to those described above for Site USN2: Naval Undersea Warfare Center, Division Keyport and Associated Ranges
- Correspondence Reference(s): July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN18: Sinclair Inlet; naval restricted areas

- Affected ESU(s): Puget Sound chinook
- INRMP: Not required.
- DOD Description of Facilities & Activities: This area is support and security zone for the Puget Sound Naval Shipyard.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: Specific issues are all related to any changes affecting the Puget Sound Naval Shipyard and or Naval Base Kitsap.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: This security zone is an extension of Naval Submarine base Bangor and thus, the mission impacts are identical to those described above for Site USN9: Puget Sound Naval Shipyard. . Additionally, if Sinclair Inlet is designated as critical habitat for salmon, changes would be expected for the improvement of the habitat. Currently, the waterfront of the shipyard is specifically configured to provide protection and accommodate movement of large Navy vessels at our piers and into our dry-docks. In order to continue our mission, we cannot alter these features. However, they do not provide ideal habitat for salmon. The listing of Sinclair Inlet as critical habitat would increase pressure to alter the waterfront of the Shipyard, negatively affecting our ability to maintain and repair ships and therefore, impacting national security. The work performed by PSNS & IMF is currently subject to the Endangered Species Act, the Clean Water Act and many other federal and state regulations that are protective of Sinclair Inlet. Excluding Sinclair Inlet, or a portion thereof, from the critical habitat designation will not jeopardize the existence of salmon in Sinclair Inlet.
- Correspondence Reference(s): July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN19: Carr Inlet; naval restricted areas

- Affected ESU(s): Puget Sound chinook
- INRMP: Not required.
- DOD Description of Facilities & Activities: This is one of the Navy's open water marine area Test Range in Puget Sound for non-explosive acoustic research activities. Testing is similar to that done Site USN12: Hood Canal and Dabob Bay, Wash and specific to submarines.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: No site-specific issues described or anticipated.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: This range is one of the Ranges in Puget Sound thus, the mission impacts are similar to those described above for Site USN2: Naval Undersea Warfare Center, Division Keyport and Associated Ranges.
- Correspondence Reference(s): July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN20: Dabob Bay, Whitney Point; naval restricted area

- Affected ESU(s): Puget Sound chinook and Hood Canal summer-run chum salmon
- INRMP: Not required.
- DOD Description of Facilities & Activities This site is an open water marine area support zone for activates at Site USN12: Hood Canal and Dabob Bay, Washington, naval non-explosive torpedo testing area. The site is now part of the larger Dabob Bay Range Site of the Dabob Bay Range Complex, Site USN12.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: No site-specific issues described, but are related to any changes affecting Naval Undersea Warfare Center, Division Keyport
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: This security zone is an extension of Site USN12: Hood Canal and Dabob Bay, Wash; naval non explosive torpedo testing area and thus, the mission impacts are identical to those described above for Site USN12: Hood Canal and Dabob Bay, Wash; naval non explosive torpedo testing area
- Correspondence Reference(s): July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

Site USN21: Port Townsend, Indian Island, Walan Point, naval restricted area

- Affected ESU(s): Puget Sound chinook and Hood Canal summer-run chum salmon
- INRMP: Possible partial overlap with NAVMAG Indian Island INRMP area.
- DOD Description of Facilities & Activities: This is an open water marine area supporting ship loading and pier operations. Site USN1: NAVMAG Indian Island.
- DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation: No site-specific issues described, but are related to any changes affecting NAVMAG Indian Island.
- DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation: This security zone is an extension of Site USN1: NAVMAG Indian Island and thus, the mission impacts are identical to those described above for Site USN1: NAVMAG Indian Island

- Correspondence Reference(s): July 6, 2004, letter from R. Scott Markert (Navy) to Donna Darm (NOAA Fisheries).

NOAA Fisheries Record of Navy Consultations

Title of Consultation Date Received Status

Naval Magazine Indian Island Seahawk Exercises - ESA Section 7 consultations were completed from 1999 - 2004

Magnetic Silencing Facility Piling Repair and Replacement ESA Sect 7 consultation - completed October 2003

Naval Magazine Indian Island Joint Logistics Over the Shore (JLOTS) Exercise conducted with U.S. Army - ESA Sect 7 consultation in 2003.

Demolition of Whitney point Range Station Buildings. 5-Jan-01 Completed

U.S. Navy Explosive Ordnance Disposal Training Operations, Island County 9-Jan-01
Consultation in Process

Naval Magazine Indian Island Ammunition Wharf Piling Replacement 14-May-01 Completed

Ditch Repair on Wheeler Mountain 21-May-01 Completed

Naval Station Everett Piers Delta and Echo Pile Repairs Project & EFH 27-Aug-01 Completed

Log Boom Security Barrier at Naval Station Everett & EFH 1-Oct-01 Completed

Force Protection Barrier at Subbase Bangor 10-Oct-01 Completed

Log Boom Security Barrier for Pier Bravo & EFH 12-Oct-01 Completed

Repair and Maintenance of Moorings E, F, and G at Naval Station Bremerton, Sinclair Inlet 29 Nov-01 Completed

Goldsborough Creek Bridge 26-Aug-02 Completed

Indian Island Ammunition Wharf Improvements 26-Aug-02 Completed

Puget Sound Naval Shipyard Pier 5 Repair 24-Sep-02 Completed

Dock Repair on Upper Twin Lake Naval Radio Station (T) Jim Creek 10-Oct-02 Completed

Navy X-band Radar - Docking Facility 20-Dec-02 Completed

Subdebron 5 Support Facilities 10-Jan-03 Completed

Bremerton Naval Complex Waterfront Security Barrier System 5-Feb-03 Completed

Bremerton Naval Complex Erosion Control 21-Apr-03 Completed

Phase II Remedial Action Operable Unit B Terrestrial, Erosion Control System - Bremerton Naval Complex 13-May-03 Completed

Munitions and Explosives of Concern Erosion Test at Naval Magazine Indian Island 20-May-03 Completed

Rock Groin Removal and Stream Maintenance 29-May-03 Completed

Naval Air Station Whidbey Island Fuel Pier Repair 9-Jul-03 Completed

Repair to Pier B Wave Attenuation Baffles 9-Jul-03 Completed

Stormwater Outfall Repair Puget Sound Naval Shipyard 28-Jul-03 Completed

Northend Landfill Naval Magazine Indian Island 1-Aug-03 Completed

Puget Sound Naval Shipyard and Intermediate Maintenance Facility
Pier 3 Fendering Replacement 20-Nov-03 Completed

Inwater Facilities at Fox Island Laboratory (Pierce County) 29-Dec-03 Completed

Aquatic Disposal Operable Unit B King County 10-Feb-04 Completed

Active-Acoustic Underwater Security Surveillance System Kitsap County 20-Feb-04 Completed

Culvert Replacement on Heins Creek Kitsap County 16-Mar-04 Completed

Intermediate Maintenance Facility, Pier 5 Repair and Maintenance
King County 17-Mar-04 Completed

Naval Magazine Indian Island Seahawk 2004 Exercises King County 7-May-04 Completed

Northwest Range Complex 30-Jun-04 Pre-Consultation/ Technical Assistance

Bangor Explosives Handling Wharf Piling Replacement Kitsap County 9-Sep-04 Reviewing
Request for Completeness

Enclosure 2: Navy & Army Site Maps

Map USN1: NAVMAG Indian Island

Map USN2: Naval Undersea Warfare Center, Division Keyport and Associated Ranges in Puget Sound

Map USN3: Naval Submarine Base Bangor (now part of Naval Base, Kitsap)

Map USN4: Manchester Fuel Depot
Map USN5: Naval Air Station Whidbey Island
Map USN6: Naval Station Jim Creek
Map USN7: Naval Station Everett
Map USN8: Naval Station Bremerton (now part of Naval Base, Kitsap)
Map USN9: Puget Sound Naval Shipyard
Map USN10: Naval Submarine Base, Bangor security zone
Map USN11: Strait of Juan de Fuca, Wash; air-to-surface weapon range, restricted area
Map USN12: Hood Canal and Dabob Bay, Wash; naval non explosive torpedo testing area
Map USN13: Strait of Juan de Fuca, eastern end; off the westerly shore of Whidbey Island naval restricted areas
Map USN14: Admiralty Inlet, entrance; naval restricted area
Map USN15: Port Gardner, Everett Naval Base, Naval Restricted Area, Everett, Washington
Map USN16: Hood Canal, Bangor, naval restricted areas
Map USN17: Port Orchard Passage; naval restricted area
Map USN18: Sinclair Inlet; naval restricted areas
Map USN19: Carr Inlet; naval restricted areas
Map USN20: Dabob Bay, Whitney Point; naval restricted area
Map USN21: Port Townsend, Indian Island, Walan Point, naval restricted area
Map USA1: Pier 23
Map USA2a: Fort Lewis (freshwater)
Map USA2b: Fort Lewis (near shore marine)
Map USA3: Yakima Training Center



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON DC 20310-0600

OCTOBER 25, 2004

Environmental Programs Directorate

Ms. Donna Darm, Assistant Regional Administrator, Protected Resources Division
National Oceanic and Atmospheric Administration - Fisheries
525 NE Oregon Street
Portland, Oregon 97232-2737

Dear Ms. Darm:

I am providing Army information pertaining to national security impacts that would result from designating critical habitat for steelhead and salmon on property owned, leased, or used by the Army. This responds to your letter on September 22, 2004.

Enclosed are revised installation summaries for Fort Lewis, Yakima Training Center, and Pier 23 that include details on potential changes to military activities and national security impacts that would result from critical habitat designations. It is impossible to quantify the cumulative impact of designations, but we estimate that 10-20% of the required training will either not be performed, or will only be performed infrequently. Any delays to, or restrictions on, the quality and intensity of training could compromise the readiness of troops, and have a potentially significant impact on national security.

I concur that National Guard Armories and small Army facilities are not within any of the areas under consideration for critical habitat designation. In cooperation with Mr. Stone, we have also determined Army's small Reserve sites are not within areas considered for critical habitat. The maps you provided need no further revision except the two additions identified for Yakima Training Center in the enclosure.

I appreciate this opportunity to work with you further on accomplishing effective conservation of steelhead and salmon while maintaining our Army readiness capability. Please continue to work with our point of contact, Mr. Bill Woodson, 703-601-1962.

Sincerely,

A handwritten signature in black ink, reading "Christopher E. Schuster", is written over a printed name and title.

Christopher E. Schuster
Colonel, U.S. Army
Director, Environmental Programs

Enclosure

Site USA1: Pier 23

- **Affected ESU(s):** Puget Sound chinook

- **INRMP:** Yes

- **DOD Description of Facilities & Activities:** The Pier 23 property is operated and maintained by the Army Reserve, which leases the 7.4 acres of submerged lands and 3 acres of uplands from the Port of Tacoma. The Army Reserve owns, controls, and has command of the pier structure, all facilities on the pier, and all structures and improvements on the upland property. The property includes a pier, warehouse building, a trailer, storage areas, and parking. Pier 23 is located in a highly industrialized area in the northwestern end of the Port of Tacoma industrial yard and is situated between the Hylebos and Blair waterways along the shoreline of Commencement Bay. Adjacent activities to Pier 23 include Tyson Foods, Occidental Chemical, shipyards, warehouse facilities, and parking lots to the north and east. Directly south of the pier are a number of rail lines perpendicular to the shoreline, which were once used to launch large ships. Shoreline ownership includes the City of Tacoma, Port of Tacoma, Pierce County, State of Washington, Puyallup Indian Tribe, and private entities. Much of the public land is leased to private industrial and commercial enterprises. The area includes mostly paved surfaces surrounding a 15,000-square foot warehouse with some exposed soil, fill material, concrete reinforced riprap, and weeds occupying a narrow area along the southeastern border and southern shoreline. The landward half of the pier was constructed of timber prior to World War II, and a concrete extension was added in 1946. Pier 23 is currently used for ship maintenance and weekend training of reservists. The units that train at Pier 23 are transportation units and train using the Logistic Support Vessel (LSV), Landing Craft, Mechanized (LCM), tugs and barges, and the floating crane. Exercises involve the transfer of equipment from the shore to the watercraft. Either via the shore crane, the floating crane or roll on, roll off exercises where they drive High-Mobility Multi-Purpose Wheeled Vehicle (HMMWV) down the beach and onto the watercraft. Such exercises at Pier 23 are not only training, but operational in nature.

- **DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation:** The Integrated Natural Resources Management Plan (INRMP) for the US Army Reserve 70th Regional Readiness Command (RRC) is in the final stages of review and it contains measures for the protection of salmon habitat which are already being implemented. An endangered species management plan will also be developed that will now include additional salmon habitat conservation and enhancement requirements. An updated Pier 23 storm water pollution prevention plan and vessel response plan, removal of contaminated soil during construction activities, and sediment remediation work are just some of the efforts Pier 23 is undertaking to ensure protection of water quality and salmon habitat. The Army Reserve currently implements best management practices to minimize any impact to water quality and fish habitat including "parking" barges on the shallow end of the pier and being careful to not rev props when close to shore to minimize prop wash. In addition, shore exercises are done in conjunction with fish windows when fish are least likely to be in the area.

• **DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation:** Pier 23 and its associated facilities are required for the training of the 385th Transportation Battalion, 175th Floating Craft Company, 185th Medium Boat Company, 467th Transportation Terminal, 647th Cargo Documentation Detachment, 804th Movement Control Detachment, and 805th Logistics Support. These units use the pier facilities primarily for Army watercraft maintenance and for the training of reserve soldiers. At full operational capacity, up to 400 reservists will utilize the Pier 23 facilities. Critical Habitat (CH) designation on this facility would have a direct impact on unit training by delaying training that support the nationwide US Army military mission and the US Army Reserve's mission in worldwide deployment. Significant training restrictions may potentially cause a restationing of the operation as far away as Mare Island California, which would cost millions of dollars and leave untrained soldiers.

Site USA2: Fort Lewis

- **Affected ESU(s):** Puget Sound Chinook

- **INRMP:** Yes

• **DOD Description of Facilities & Activities:** Fort Lewis is an 86,176-acre military reservation located in western Washington. It is designated as a major military facility for both weapons qualifications and field training. Out-of-state Army units and units from allied foreign nations use the facilities including Gray Army Airfield. Dense forest covers much of the installation and is ideal for light infantry maneuvers, which are primarily conducted on foot. The training areas include forestlands, wetlands, grasslands, brush, and marine environments. Training areas are delineated into maneuver, impact, range, and other training areas. Open areas and drop zones provide adequate space for platoon and some company maneuver training. Off-road maneuver training areas include vehicle training, bivouac, and position digging. There are 187 training facilities (115 firing ranges, non-firing facilities, live-fire maneuver, and training areas) covering approximately 64,000 acres. Gunnery training activities occur on the ranges including restrictive usage of high explosive ordnance. Other training capabilities include: fixed artillery and mortar points, drop zones and an assault strip, non-firing training facilities including rappel and nuclear, biological, and chemical chambers, ammunition storage areas, and urban combat areas. Fort Lewis is in the process of transforming Army training to meet worldwide requirements for deployment and serve as the organizational and operational model for suitability of new equipment and training methods. This transformation will provide war-fighting commanders with increased options for small-scale contingencies without compromising readiness for a major theater of war.

• **DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation:** The two major future consultations are the Army Transformation and Resource Sustainability at Fort Lewis and Yakima Training Center, Washington and Fiscal Year 2005 Stationing Actions at Fort Lewis and Yakima Training Center, Washington. A biological assessment and essential fish habitat assessment has been prepared for both actions. The biological assessments address potential impacts to listed species and candidate species as appropriate. An initial determination of "may affect, but is not likely to adversely affect" Chinook salmon and steelhead is proposed in the documents as they incorporate Fort Lewis Regulation 420-5 which provides specific protection measures for fish species. Protection also is provided to salmonid species through the actions identified in the Integrated Natural Resources Management Plan (INRMP), which was required by the Sikes Act. Potential changes to military activities as a result of critical habitat designation could include: increased time to consult on specific training actions, additional funding would be necessary to include an assessment of potential impacts to critical habitat in each biological assessment and its associated environmental documents, alteration of training timing and activities, at specific locations, to include measures associated with critical habitat criteria.

- **DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation:** Increased costs to specific troop units would occur as they are responsible to pay for NEPA documents analyzing potential impacts of their actions

on critical habitat and listed species. In addition, the increased time necessary for consultations with NOAA Fisheries could hinder some types of training that rely on immediately available training locations. They could lose the flexibility to take advantage of situations that could enhance the training environment, should they be restricted by the timing requirements of formal or informal consultations. Current training sites that could be affected by the designation of critical habitat include: Muck Creek, Nisqually River, and the marine areas of Solo Point. Training activities that could be affected by the designation of critical habitat are: Muck Creek – changes in timing of crossings between training areas to avoid critical life stages; Nisqually River – changes in river crossings (vehicle and soldiers) to avoid critical life stages, changes in activities to defend and secure the bridge or attach the bridge to avoid pollutant increases, and changes in location or timing of placement of raft bridges to avoid critical life stages; and Solo Point – changes in frequencies or timing of diver actions, airborne jump actions, boat landings, onshore delivery of equipment, and swimming vehicles to avoid impacts to essential fish habitat and critical life stages. If designation of critical habitat results in alterations of current or planned future training actions, impacts to national security would occur. It is essential that a training environment be provided to ensure that troops are ready for any potential situation they may be exposed to once deployed. However, Fort Lewis believes that the existing management plans and regulations provide benefits to the species that outweigh the benefits of specifying Fort Lewis aquatic areas as critical habitat and would not result in the extinction of the species concerned.

- **Correspondence Reference(s):** May 3, 2004 letter from Richard A. Hoefert (Army) to Donna Darm (NOAA Fisheries).

Site USA3: Yakima Training Center

- **Affected ESU(s):** Upper Columbia River and Middle Columbia River O. mykiss

- **INRMP:** Yes

- **DOD Description of Facilities & Activities:** The Yakima Training Center (YTC) is situated in the Columbia River Basin of eastern Washington State. Currently, the YTC provides military training facilities and logistical support for cross-country maneuvers and operational live-fire training opportunities. Major military land uses at YTC include the cantonment area with residential, administrative, commercial, light industrial, and open space uses; training areas with maneuver, impact, firing ranges, and other special uses; and the Selah Airstrip and Vagabond Army Airfield. As a training facility, YTC provides the opportunity, facilities, and support for military units, including both active and reserve component forces, to enhance troop readiness and train for mobilization and post mobilization exercises. All branches of the armed forces and allied military units train at YTC to sustain and improve unit readiness for both wartime and contingency operations. In addition, Fort Lewis and YTC have been identified as one of the installations to be the lead in a transformation process for the Army's conversion into a more responsive, agile, and versatile force. This process will be initiated at Fort Lewis by the transformation and stand up of existing units to Interim Brigade Combat Teams. Fort Lewis/YTC is also conducting Stryker vehicle training. Stryker comprises two variants – the Infantry Carrier Vehicle and the Mobile Gun System. The Infantry Carrier Vehicle has eight additional configurations: Reconnaissance Vehicle, Mortar Carrier, Commanders Vehicle, Fire Support Vehicle, Engineer Squad Vehicle, Medical Evacuation Vehicle, Anti-tank Guided Missile Vehicle, and NBC Reconnaissance Vehicle. The armored wheeled vehicle is designed to enable the Stryker Brigade Combat Team to maneuver more easily in close and urban terrain while providing protection in open terrain.

- **DOD Description of Anticipated Future Consultations and Potential Changes to Military Activities as a Result of Critical Habitat Designation:** There are several anticipated future consultations (informal) that will commence in the near future pertaining to the following National Environmental Policy Act (NEPA) documents: Yakima Training Center Planning Supplement Environmental Assessment (EA) (Supplement to installation's Master Plan); Fiscal Year 2005 Stationing Actions at Fort Lewis and Yakima Training Center, Washington EA; Army Transformation and Resources Sustainability at Fort Lewis and Yakima Training Center, Washington, Environmental Impact Statement. All of these NEPA documents have draft Biological Assessments in which impacts to currently listed salmonid species and their habitat have been identified and evaluated. If critical habitat (CH) is designated on YTC, an additional analysis related to whether an adverse modification and/or destruction of CH would need to be completed for each of those projects. The species and their habitat have been considered both in the development and implementation of the installation's Integrated Natural Resources Management Plan (INRMP) and in the assessment of potential impacts from proposed actions and in past NEPA decisions. For each of the three aforementioned proposed actions, a

determination of “may affect, not likely to adversely affect” has been made as a result of the limited amount of suitable habitat available, the limited use of that habitat on the installation by the listed species, and the adequacy of existing regulatory mechanisms including protection measures, restoration activities, and mitigation measures.

• **DOD Description of National Security Impacts of Consultations or Changes to Activities as a Result of Critical Habitat Designation:** YTC currently consults on proposed actions with consideration for listed salmonids and their habitat. The impacts on national security from consultations or changes to activities is thought to be minor if it does not result in more “restrictive” measures for the protection and conservation of listed salmonids. Compliance requirements that would limit training opportunities will result in impacts to national security. The specific impacts would depend on what is proposed as CH and the extent at which activities, if any, would be restricted within and adjacent to CH. Restrictions on training activities in CH and restrictions on live fire exercises within CH drainages would result in impacts to training and national security. Terrain features within and adjacent to those areas proposed as CH are ideal for small unit (special forces) training exercises (to include live-fire exercises). The demand for these kinds of training areas and this type of training is increasing due to the increased number of small unit special operations currently taking place in the current war on terrorism. The trend for small special operations will also increase in the future as the anticipated threats in the future change to more terrorism related threats. Areas replicating those areas found in Iraq and Afghanistan are becoming disproportionately important in training soldiers in small unit special operations compared to traditional ranges and maneuver areas. In addition, Fort Lewis/YTC is the only installation in the continental United States where Stryker vehicle training is occurring. These forces are currently being deployed in Iraq as their training becomes complete. Under the worst-case scenario, designation of CH could result in limitations in the use of the Multi Purpose Range Complex, Multi Purpose Training Area and the Central Impact Area due to their potential fire impacts on CH. With current management that already focuses on protection and restoration, flexibility in providing the training opportunities that are required has enabled YTC to meet our national security needs. Any reduction in the ability of YTC to provide realistic training situations and trained soldiers would impact national security.

• **Map Corrections/Revisions:** Two additional sites on YTC (Johnson Creek, Lmuma Creek), as well as the two sites identified on the proposed CH map (Hanson Creek, Alkali Creek) constitute the four streams on YTC with existing fisheries and access to either the Columbia River or the Yakima River. That portion of Johnson Creek from where it leaves the installation’s eastern boundary, west to the confluence of Foster Creek has both resident rainbow and steelhead, as well as, Chinook salmon. That portion of Lmuma Creek west of the Badger Pocket Road to where it leaves the installation at its western boundary has resident rainbow and potentially steelhead.

• **Correspondence Reference(s):** May 3, 2004 letter from Richard A. Hoefert (Army) to Donna Darm (NOAA Fisheries).

Department of Defense National Security Zones and Integrated Natural Resource Management Plan (INRMP) within the Range of Areas under consideration as Critical Habitat

